

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION

MIKE CAMPBELL,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:18-cv-4129-BCW
	)	
CHERI TOALSON REISCH,	)	
	)	
Defendant.	)	

**Joint Motion for Entry of Judgment Under Rule 58(d)**

The parties respectfully move under Rule 58(d) for entry of judgment in a separate document as required by Rule 58(a). In support of which, the parties state as follows:

1. This action was tried on April 19, 2019.
2. On August 16, 2019, the Court entered its Findings of Fact and Conclusions of Law, granting declaratory and injunctive relief to Plaintiff.
3. The Court's Findings of Fact and Conclusions of Law were not denominated as a "Judgment," and the Clerk of Court has not entered a Clerk's Judgment.
4. Defendant filed her notice of appeal on September 13, 2019 out of an abundance of caution.
5. To ensure Defendant's appeal is not dismissed by the Eighth Circuit for lack of a final judgment, the parties jointly request under Fed. R. Civ. P 58(d) that final judgment be set out in a separate document as required by Rule 58(a).

WHEREFORE, the parties respectfully request that the Court enter an appealable final judgment.

Dated: December 17, 2019

/s/ J. Andrew Hirth

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Respectfully Submitted,

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